UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re:		D
		Bky. No. 03-43226 NCD
AK Medical, Inc.,		Adv. No. 04-4087
	Debtor,	
John R. Stoebner,		ANSWER OF TRINITY MEDICAL SOLUTIONS, INC.
	Plaintiff,	
v.		
Trinity Medical Solutions, Inc.,		
	Defendant.	
Trinity Medical Solutions, Inc. ("Trinity") as and for its Answer to Plaintiff's Complain		

Trinity Medical Solutions, Inc. ("Trinity") as and for its Answer to Plaintiff's Complaint, hereby states and alleges as follows:

- 1. Trinity denies each and every allegation of Plaintiff's Complaint, unless specifically admitted or otherwise responded to hereinafter.
- 2. Trinity admits paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 (a), (b), (c), (d), (i), and 12, 14, 18 and 22 of Plaintiff's Complaint.
- 3. Trinity denies paragraph 10, 10(c), (e), (f), (g), (j), (k), and 13, 15, 17, 19, 21, and 23 of Plaintiff's Complaint.
- 4. Trinity further states by way of further explanation and clarification: as to paragraph 10(c), Mr. Meyens is not an officer; as to paragraph 10(b), it involved a transfer of

only the contracts and de minimus property; as to paragraph 10(f), not all are currently employees; and as to paragraph 10(h), the allegation is irrelevant and the document referred to therein speaks for itself.

WHEREFORE, Trinity Solutions, Inc., respectfully demands:

- 1) That Plaintiff's Complaint be dismissed, with prejudice, in favor of Defendant; and
- 2) Such other and further relief as the Court deems just and equitable.

Dated: 3-24-04

Thomas J. Flynn (30570)

Larkin Hoffman Daly & Lindgren Ltd.

1500 Wells Fargo Plaza

7900 Xerxes Avenue South

Minneapolis, Minnesota 55431-1194

(952) 835-3800

Attorneys for Defendant

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UNSWORN CERTIFICATE OF SERVICE

Under penalty of perjury, I declare that on March 24, 2004, I served the following document(s):

RE: AK Medical, Inc. – Bky. No. 03-43226 John R. Stoebner v. Trinity Medical Solutions, Inc. – Adv. No. 04-4087 Our File No. 29,228-00

- 1. Answer of Trinity Medical Solutions, Inc., and
- 2. Proof of Service.

via first class mail by enclosing a copy thereof in an envelope, postage prepaid, and by depositing the same in the post office at Bloomington, Minnesota, to each party entitled to notice at the address(es) listed below.

John R. Stoebner, Esq.
Lapp, Libra, Thomson, Stoebner & Pusch, Chartered
One Financial Plaza, Suite 2500
120 South Sixth Street
Minneapolis, MN 55402

Britt M. Finstad

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